



ADVISORY NEIGHBORHOOD COMMISSION 8A

Government of the District of Columbia
Anacostia/Fairlawn/Hillsdale/Sheridan

Executive Officers

February 14, 2020

Troy Donté Prestwood
Chairman

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Director
DC Office of Planning
1100 4th Street SW, Suite E650
Washington, DC 20024

Dorcas Agyei
Vice Chair

Hanna Baker
Secretary

Ty'on Jones
Treasurer

Via Email: Plandc@dc.gov

Commissioners

RE: Mayor's Draft DC Comprehensive Plan Update

Holly Muhammad
SMD 8A01

Dear Director Trueblood:

Barbara J. Clark
SMD 8A02

At its regularly scheduled, properly noticed meeting on February 4, 2020, with a quorum of 7 Commissioners present, Advisory Neighborhood Commission (ANC) 8A voted **unanimously** to submit the attached comments and recommendations on the Mayor's Draft DC Comprehensive Plan Update. The comments reflect the incredible insights and analysis from Commissioners, ANC 8A Education Committee members, faith leaders, and impacted residents, to name a few.

Brian Thompson
SMD 8A03

Troy Donté Prestwood
SMD 8A04

We look forward to your full review and ultimate inclusion of the attached comments and recommendations on the DC Comp Plan. We are also happy to follow up on any questions that may arise.

Dorcas Agyei
SMD 8A05

Ty'on Jones
SMD 8A06

Thank you for the opportunity to provide this letter.

Hanna Baker
SMD 8A07



Mr. Troy Donté Prestwood
Chairman
Advisory Neighborhood Commission 8A

Enclosures: 14



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Far Southeast and Southwest Area Element

Current Proposed Language: “1808.12 Policy FSS-1.1.11 Workforce Development Centers Support the development of additional vocational schools, job training facilities, and workforce development centers. ADD consider co-locating these programs within school settings where appropriate, including the Infrastructure Academy. Encourage the retention of existing job training centers, and the development of new centers on such sites as the St. Elizabeths Campus and DC Village to increase employment opportunities to local residents.”

Recommendation: *In favor of the intent of this element; however propose language to be added regarding the roles of schools in workforce development. There were also sentiments expressed regarding supporting established workforce development programs that have demonstrated successful results in training individuals in various vocations.*

Current Proposed Language: “1808.14 Strongly support the modernization of schools in the Far Southeast/ Southwest Planning Area. Plans for additional housing must be accompanied by a commitment to improving educational facilities to meet current and future needs, and recognition that education is among the community’s highest priorities. “

Recommendation: *It is recommended that modernization is defined for transparency. Add language related to housing developers within a certain proximity to a school contributing financially to school modernization efforts as defined. Lastly, policies/processes for community benefits agreements that relate to schools should be developed or provided to the public. Often developers allude to benefits for schools and other educational entities without following guidelines for distributing those funds or services. Additionally, CBAs related to public services should be easily accessible to the public on DC Planning’s website for accountability purposes.*

Educational Facilities Element

Current Proposed Language: ~~“Coordinate with educational and business partners to~~ Increase the availability of quality early education, child care, after school, and preschool programs for all residents, especially low and middle income households and families with children with disabilities through educational and business partnerships. (p. 43)

Recommendation: *In favor of the intent of this element; however more actionable and measurable language should be used. Remove the language that is crossed out in the proposed language above.*

Current Proposed Language: ~~NEW A School Improvement Team (SIT)~~ Use the LSAT which is established at every DCPS school where a major capital project (to include modernization, school replacement, addition, renovation or remodeling) is scheduled within the next one to two fiscal years. The LSAT SIT includes parents, neighbors, and community members as well as DCPS and DGS staff. The LSAT SIT has several duties, including providing feedback during the development of education specifications and schematic design and assisting with disseminating information about the progress of the school improvement to constituencies and peers represented on the LSAT SIT . Team members are also expected to consult on issues that arise during construction, be available to receive updates, and serve on the SIT through the end of construction. (p. 9)

Recommendation: *The school improvement team (SIT) is removed and the Local School Advisory Team (LSAT) should serve in this role for DCPS. Per the DCPS website, LSATs are groups of elected and appointed members that exist in every DCPS school. The team consists of parents, teachers, non-instructional school staff, a community member, and in some cases students, to advise the principal on matters that promote high expectations and high achievement for all students. In effort to reduce the number of groups that staff have to be dedicated to it is recommended that the LSAT absorb responsibility of approving development plans in addition to any DGS and necessary project staff.*

Other Recommendations:

- *Page 14 EDU-1.16. Fine and performing arts should be specifically referenced in this element, as it is written “cultural” could be loosely interpreted.*
- *Page 15 EDU-1.1.B: Remove this policy or add additional language to define partnerships and rationale for providing space to selected organizations.*
- *Keep element 1209.4. It supports the community schools model that is currently being implemented by DCPS, specifically in Anacostia and Ballou High Schools which are educational pillars of Ward 8.*
- *Add element related to distance students to travel to access educational facilities.*

Current Proposed Language: “NEW Across Washington, DC, school facilities and grounds serve as community assets by providing recreational space, meeting space, and more. As part of the facility modernization planning process, DCPS will continue to engage communities on how modernized facilities and grounds could better serve the needs of the surrounding communities and improve quality of life.” (Educational Facilities; p. 9)

Recommendation: *Clearly define community engagement to include DCPS’ Office of Community Engagement and ANC within this element*

Current Proposed Language: “MOVED Policy EDU-1.21.23: Co-Location of Charter and DCPS Schools Support efforts to co-locate public Charter Schools within significantly underutilized DCPS

facilities. Address Ensure that parking, traffic, noise, needs for green open space and recreational facilities, and other impacts associated with increased enrollment and space utilization are addressed when co-location occurs. 1204.7.” (Educational Facilities, p. 14)

Recommendation: *Include language related to co-locating schools with similar age/grade ranges to ensure the environment is developmentally appropriate. Additionally, include language related to the programs having complimentary educational philosophies.*

Current Proposed Language: 1205.1 Public charter schools provide another school choice for families with school age children. As of SY2016-17, 46 percent of all public school students were enrolled in public charter schools and the DC PCSB approved the conditional opening of three more public charter schools in SY2018-19. (Educational Facilities, p. 18)

Recommendation: *Include more recent numbers or a range of supporting statistics across several years to highlight trends in charter enrollment and programs.*

Current Proposed Language: NEW Policy EDU-4.1.7: Partnerships Explore Implement collaborations with educational and business partners that can help to increase the availability of quality early childhood education, child development, after-school and pre-school programs for all residents, especially low-and middle-income households, and families with children with disabilities.

Recommendation: *Begin this element with the work “implement” to make it actionable and measurable.*

Tracking Number 0287; Proposed Amendments to the Generalized Policy Map and Future Land Use Map

Proposed Amendment: Change current zoning from a “Residential Zone” to “Mixed Use Zones” MU7 and MU4 for a portion of 13th Street, SE between Good Hope Road and U Street SE

Recommendation: *Enlarge Mixed-Use Zone (MU) area at or around the major commercial corridors of Good Hope Road, SE and Martin Luther King Jr. Avenue, SE to help neighborhood meet set development priorities by increasing the number of commercial properties needed to offer required services and create much needed employment opportunities.*

The proposal is aligned with the DC Comprehensive Plan and Future land use map and the Comprehensive Plan (CP) itself:

- *Insufficient commercial land, shopping and services (1.5%) Land Use (CP -1802);*
- *Creates more jobs (CP-1805);*
- *Planning and Development Priorities (CP-1807 f)*
- *CP Policy FSS-1.1.7: Retail Development*

The property at the corner of 13th St SE and Good Hope Rd and already divided to two units. Extending MU 7 will allow “combine upper story housing or offices and ground floor retail”. Similar property at the same Sq. 5769 is 803 – housing/retail example

General Recommendations

- *In the area element, there should be language that speaks to equity with regard to having grocery stores and supermarkets in our communities. The District should ensure that residents are adequately served in all neighborhoods*
- *Land use in the Far Southeast and Southwest Area Element and the Far Southeast and Northeast Element should have an increased focus on family housing verses housing for single households only*
- *The “great weight” of Advisory Neighborhood Commissions (ANCs) should be preserved in all government-backed and/or government-regulated development and projects*
- *The voice of impacted residents should be protected when proposed development(s) come into a community*
- *As had been suggested by others, the language should be definite - such as “shall” versus “should” and “must” instead of “ought” when it comes to the rights of District residents*
- *The possibility of displacement should be assessed before allowing proposed development to come into a community*
- *Proposed development(s) must not erase the cultural identity of the impacted neighborhood*
- *Any housing development should ensure the provision of housing for families such as three bedrooms, etc.*
- *Public housing should be preserved to provide housing for low-income residents whose earnings fall significantly below the area Median Family Income (MFI)*
- *Public transportation options such as rapid transit should be expanded to underserved communities to provide access to employment, shopping, and medical services*
- *Every community should have access to a full-service hospital as well as urgent care centers*
- *The District should focus more resources on meeting the basic needs of residents, i.e., housing, quality schools, hospitals before focusing on luxury/non-emergency projects, i.e., stadiums, dog parks, etc.*
- *Priority for employment opportunities should be offered to (and maintained among) residents in the community being developed*

- *Utility companies should not be allowed to levy liens on residents' homes. Advisory Neighborhood Commissions (ANCs) should have "great weight" on any proposed hike in utility rates*
- *The Median Family Income (MFI) should reflect the incomes of that area. This would ensure greater equity in housing*
- *District Tax breaks should only be given if vacant units are occupied by low-income or homeless individuals/families*
- *The University of the District of Columbia should have a satellite campus in each quadrant of the city*
- *The District should ensure that worship services in houses of faith are not negatively impacted by parking restrictions and that provisions should be made during worship hours for parking*
- *Change all uses of the word "cultural" to "multicultural"*

The River East Design Center

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Comments on the DC Comprehensive Plan

February 7th, 2020

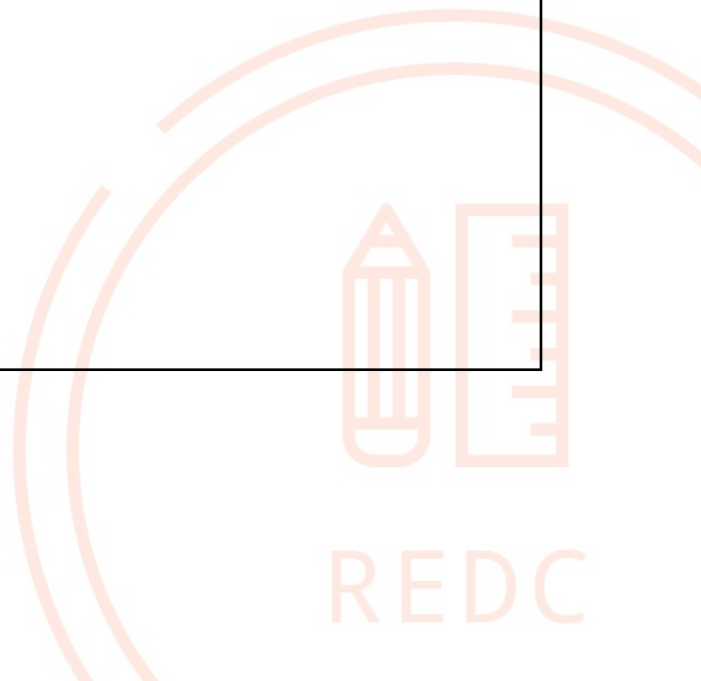
OVERVIEW

The River East Design Center is a group of architects and designers that live and/or work in the northeast and southeast neighborhoods of Washington, DC. We believe in the power of the collective voice and we know communities have the ability to shape and influence their own environments. Our mission is to empower these communities by providing educational opportunities and low-cost design services.

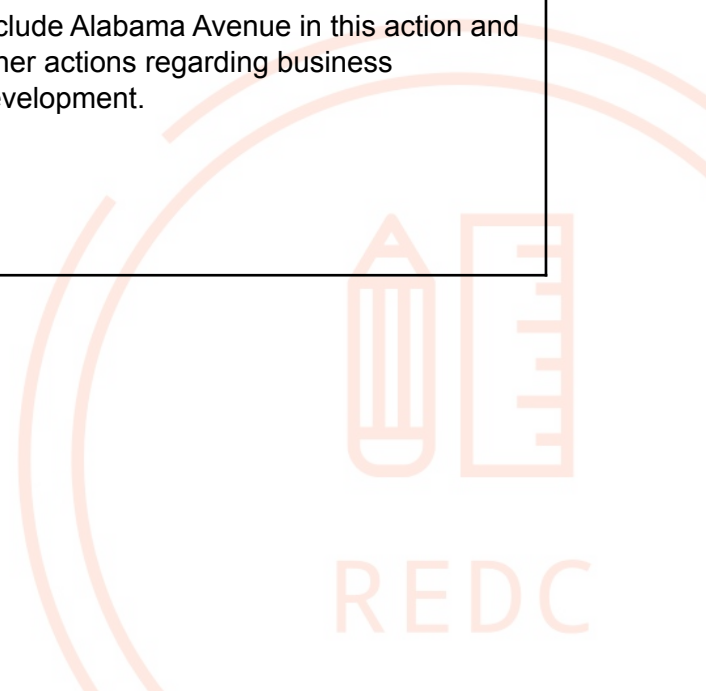
In keeping with our mission to serve, we are submitting comments on the Far Southeast and Southwest Area Element of the District's Comprehensive Plan. Our comments emphasize the importance of equitable design and development and community input in the planning process.



Section	Comment
<p>Policy FSS-1.1.2: Conservation of Lower Density Neighborhoods Protect existing single-family housing within the Far Southeast/Southwest by appropriately designating such areas as “Low Density Residential” on the Comprehensive Plan Future Land Use Map, and by zoning such areas for single family, rather than multi-family housing. 1808.3</p>	<ul style="list-style-type: none"> - Concentrate Low Density Residential areas in Historic districts apart from commercial corridors
<p>Policy FSS-1.1.3: Rehabilitation of Multi-Family Housing Support rehabilitation and stronger and more consistent code enforcement for the many garden apartments in the Planning Area, particularly in Shipley Terrace, Knox Hill, and Washington Highlands. Support city programs which provide financial assistance to renovate such complexes, with the condition that a significant portion of the units are preserved as affordable after renovation. 1808.4</p>	<ul style="list-style-type: none"> - Provide a more concrete measurement than “significant portion” of units preserved. - Preservation should ensure units suitable for families (2 bedrooms and 3 bedrooms) are available. - Develop a city task force specifically charged with helping residents return to rehabilitated units.
<p>Policy FSS-1.1.4: Infill Housing Development Support infill housing development on vacant sites within the Far Southeast/Southwest, especially in Historic Anacostia, and in the Hillside, Fort Stanton, Bellevue, Congress Heights and Washington Highlands neighborhoods. Infill with affordable housing options can help meet the demand of low income families currently living in the Planning Area, reduce family homelessness rates, and decrease the affordable housing waitlist, and infill with housing for persons of moderate income can help provide homes for persons and families who might otherwise be forced out of Washington, DC due to high housing costs. 1808.5</p>	<ul style="list-style-type: none"> - Ensure units suitable for families (2 bedrooms and 3 bedrooms) are included in infill projects.

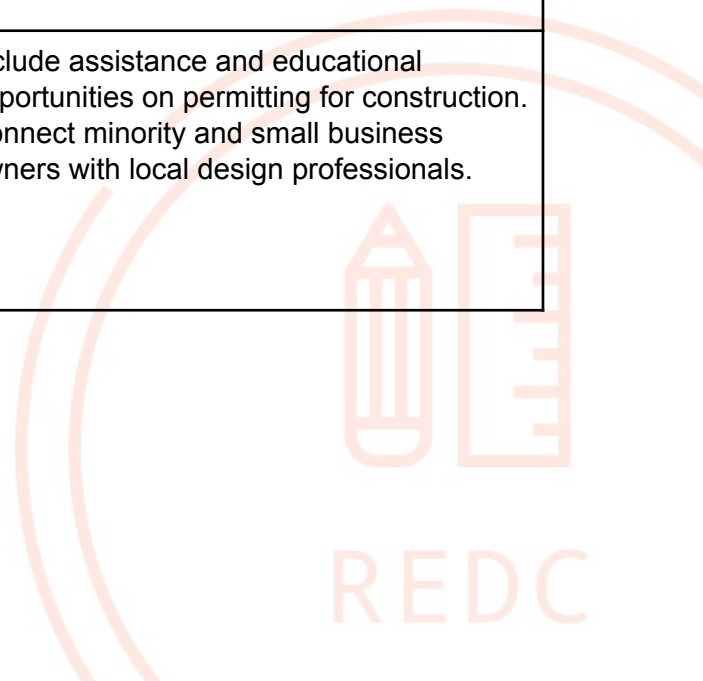


Section	Comment
<p>Policy FSS-1.1.10: Minority/Small Disadvantaged Business Development Provide technical assistance to minority-owned and small businesses in the Far Southeast/Southwest to improve the range of goods and services available to the community. Joint venture opportunities, minority business set-asides, business incubator centers, and assistance to community-based development organizations should all be used to jumpstart local business and provide jobs in the community. 1808.11</p>	<ul style="list-style-type: none"> - Include assistance and educational opportunities on permitting for construction. Connect minority and small business owners with local design professionals.
<p>Policy FSS-1.1.13: School Modernization Strongly support the modernization of schools in the Far Southeast/ Southwest Planning Area. Plans for additional housing must be accompanied by a commitment to improving educational facilities to meet current and future needs, and recognition that education is among the community's highest priorities. 1808.14</p>	<ul style="list-style-type: none"> - Incorporate crime prevention through environmental design principles (CPTED) at all schools. - Ensure space for families services to be provided at all schools (health care, social services, etc)
<p>Policy FSS-1.1.14: Sustainable Development Provide innovative solutions for sustaining economic growth without harming the environment or exhausting its resources while improving the quality of life for current and future residents.</p>	<ul style="list-style-type: none"> - Conduct a community health assessment before the start of major development projects (major to be defined based on project cost, area
<p>Action FSS-1.1.B: Façade Improvements Implement urban design and façade improvements in the established commercial districts along Martin Luther King Jr Avenue SE, Good Hope Road SE and South Capitol Street SW. Completed- See Implementation Element.1808.16</p>	<ul style="list-style-type: none"> - Include Alabama Avenue in this action and other actions regarding business development.



Section	Comment
<p>Action FSS-1.1.D: UDC Satellite Campus Pursue the development of a satellite campus for University of the District of Columbia or another university (in consultation with local colleges and universities) either in this Planning Area or in the adjacent Planning Area to the north. Possible sites could include vacated DC Public Schools, the St. Elizabeths Campus, Poplar Point, and the Anacostia Metro Station area. Completed- See Implementation Element. 1808.18</p>	<ul style="list-style-type: none"> - Consult with community for input on preferred location
<p>Policy FSS-1.2.2: Historic Resources Protect and preserve buildings and places of historic significance in the Far Southeast/Southwest community, such as the Anacostia and Saint Elizabeths Hospital historic districts. Identify and increase public awareness of other places of potential significance, and consider appropriate protections, incorporating the community's recommendations as part of the process. Support the designation of additional historic landmarks within the Far Southeast/Southwest neighborhoods. 1809.2</p>	<ul style="list-style-type: none"> - Consult community on what is historically significant and partner with local groups to identify sites.
<p>Policy FSS-1.2.3: Connecting To the River Reconnect the neighborhoods of the Far Southeast/Southwest to the Anacostia River, particularly through the redevelopment of Poplar Point, implementation of the Anacostia Waterfront Initiative park and trail improvements, and reconstruction of the Anacostia River bridges. Support National Park Service in its efforts to improve Anacostia Park amenities and access points to better serve the community. 1809.3</p>	<ul style="list-style-type: none"> - Engage community through neighborhood schools, ANCs, and organizations for discussion of desired amenities
<p>Policy FSS-2.1.1: Historic Anacostia Revitalization Encourage the continued revitalization of Historic Anacostia as a safe, walkable, and attractive neighborhood, with restored historic buildings and compatible, well-designed mixed- use projects. New development should serve a variety of income groups and household types and should restore needed retail services to the community. 1811.4</p>	<ul style="list-style-type: none"> - Encourage DC departments and agencies (HPO, DSLBD, DMPED, etc) to have conversations with developers at inception of projects

Section	Comment
<p>Policy FSS-2.1.4: Historic Preservation Encourage continued historic preservation efforts in Anacostia, including the restoration of commercial facades along Martin Luther King Jr Avenue and Good Hope Road and the rehabilitation of older and historic residential and commercial buildings. 1811.7</p>	<ul style="list-style-type: none"> - Engage business owners and property owners in rehabilitation efforts
<p>Action FSS-2.1.C: Public Facility Improvements Restore cultural and public facilities throughout Historic Anacostia, including Savoy and Burney Schools, the Anacostia Public Library, and the historic Carver Theater. Completed -See Implementation Element. 1811.10</p>	<ul style="list-style-type: none"> - Conduct community charrettes and meetings to inform and engage public
<p>Policy FSS-2.5.3: Business Improvement Support the continued efforts of the Anacostia BID and local merchants Congress Heights Main Street to manage and improve the Congress Heights and Anacostia shopping districts, provide adequate off-street parking and loading areas, manage on-street parking more effectively, and enhance building facades and storefronts. 1815.5</p>	<ul style="list-style-type: none"> - Include assistance and educational opportunities on permitting for construction. Connect minority and small business owners with local design professionals.
<p>Policy FSS-2.6.2: Business Improvement Support the continued efforts of local merchants to improve the Bellevue shopping district, provide adequate off-street parking and loading areas, and enhance building facades and storefronts. 1816.5</p>	<ul style="list-style-type: none"> - Include assistance and educational opportunities on permitting for construction. Connect minority and small business owners with local design professionals.



Comment Regarding Comprehensive Plan Recommendation No. 2344.1



Figure 1: FLUM Amendment in Recommendation No. 2344.1

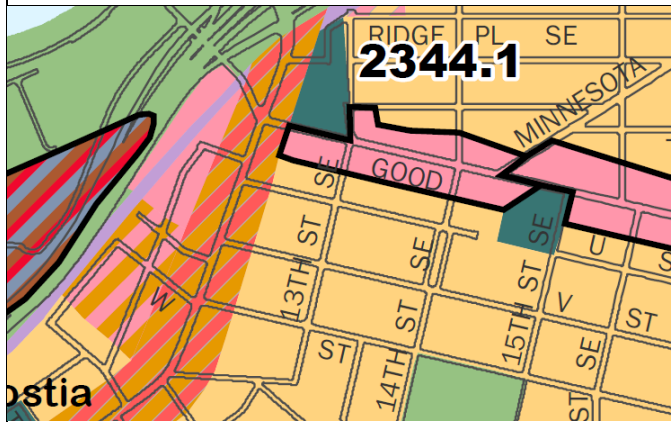


Figure 2: OP Proposed FLUM Amendment

During the Comprehensive Plan open call period, a recommendation to amend the Future Land Use Map (“FLUM”) was submitted for properties outlined in red in Figure 1 below. The recommendation was to amend the FLUM. The Office of Planning (“OP”) partially accepted this recommendation. Specifically, in the draft FLUM that was released on October 15, 2019, OP is recommending to amend the FLUM for the properties shown in Figure 1 that are located along Good Hope Road, SE. The relevant portion of the proposed FLUM is shown in Figure 2.

OP’s evaluation chart entitled “Proposed Amendments to the Maps of the Comprehensive Plan” does not provide the rationale for why the recommended FLUM amendment for the properties located on the west side of Martin Luther King Jr. Avenue, SE was not accepted. Given the context surrounding these properties, extending the recommended Mixed Use (Medium Density Commercial / Medium Density Residential) would take advantage of an opportunity to increase height and density in an area that: (i) is buffered from lower-density residential areas, (ii) has good access to transit and other

transportation infrastructure, (iii) can help create the critical mass necessary to facilitate new and support existing businesses, (iv) is consistent with District economic development and housing goals, and (v) will help address important equity issues facing this particular area of the District.

The following additional information is provided in further support of amending the FLUM to designate the properties included in Recommendation 2344.1 that are located on the west side of Martin Luther King Jr. Avenue, SE to Mixed Use (Medium Density Commercial / Medium Density Residential).

The recommended FLUM amendment is consistent with the Comprehensive Plan Guiding Principles

The consistency of the recommended FLUM amendment with the Comprehensive Plan Guiding Principles was addressed in the original recommendation submitted during the open call period. However, it is worth briefly reiterating some of these points given Mayor Bowser’s recently

released Housing Equity report, and the increase in equity issues generally throughout the District that has occurred since the open call period. As related to equity and the Comprehensive Plan Guiding Principles, the following key points are provided:

- The FLUM amendment will help Manage Growth and Change in the District by facilitating additional residential density in a location that is well-suited to accommodate such additional density without adversely impacting lower-scale developed areas / neighborhoods. The additional density will assist in achieving the District goal of creating 36,000 new residential units by 2025.
- The FLUM amendment will help Create Successful Neighborhoods by facilitating greater development that will support nearby businesses along the Martin Luther King Jr. Avenue commercial corridor.

Additional information regarding consistency with Comprehensive Plan Guiding Principles provided in originally submitted Recommendation No. 2344.1.

The recommended FLUM amendment is consistent with surrounding development context

Designating the properties in question Mixed Use (Medium Density Commercial / Medium Density Residential) would facilitate development that is consistent with the surrounding development context. The properties to the south are currently being developed in accordance with the Planned Unit Development known as Reunion Square (Z.C. Order No. 08-07), which also included a related map amendment from C-2-A (MU-4) and C-M-1 (PDR-1) to C-3-A (MU-7).

As shown in Figure 3, when looked at together with the properties that are within the Reunion Square PUD and the properties already designated as Mixed Use (Medium Density Commercial / Medium Density Residential) along the Martin Luther King Jr. Avenue commercial corridor, there is a solid planning rationale for amending the FLUM. This is particularly true of those few properties that are not already subject to the Reunion Square PUD, which are circled in Figure 3.

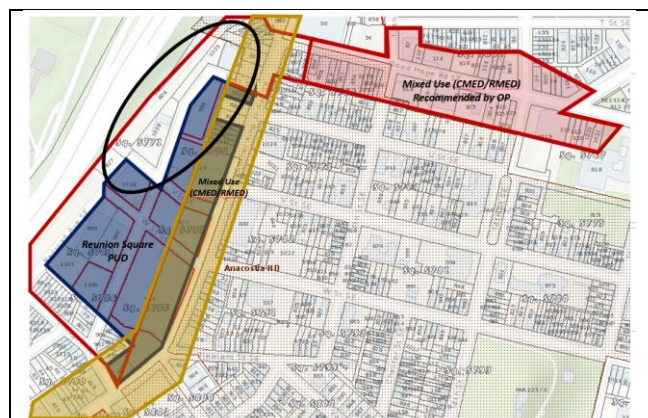


Figure 3: Relationship of properties in question and Reunion Square PUD

There are several reasons why, at minimum, the properties circled in Figure 3 should be designated Mixed Use (Medium Density Commercial / Medium Density Residential) on the FLUM.

- They are located in close proximity to the gateway intersection of Martin Luther King Jr. Avenue and Good Hope Road, an area that the Far SE/SW Area Element encourages concentration of development activity;

- These particular properties are adjacent to portions of the Reunion Square PUD that have approved heights of up to 90 feet;
- They are far away from the moderate density residential areas toward the east, on the opposite side of Martin Luther King Jr. Avenue;
- They immediately abut rail and highway infrastructure located to the west;
- They are across from the Poplar Point area, which is recommended to be designated for high density development on the proposed FLUM; and
- They are not located within the Anacostia Historic District.

Based on the forgoing reasons, the properties in question, or at minimum the properties circled in Figure 3, should be designated Mixed Use (Medium Density Commercial / Medium Density Residential) on the FLUM. A future rezoning of these properties in accordance with this FLUM recommendation would facilitate development that would be compatible with the nearby Reunion Square PUD and would not have any adverse impacts on existing residential neighborhoods. Allowing greater height and density on these properties also takes advantage of the visual access to Anacostia Park, Anacostia River, and toward the monumental core of the city. This would also enable more housing to be built in an area that is transit accessible and adjacent to a commercial corridor.

The recommended FLUM amendment addresses several equity issues

A common thread between the Mayor's Housing Initiative and the ongoing effort to amend the Comprehensive Plan is equity. The recommended FLUM amendment will assist the District in achieving its equity goals. Many of the District's current efforts over the last several years have focused on ensuring all District residents have equal access to the high-quality amenities and services that are enjoyed by residents in the more affluent areas of the city.

One important amenity is convenient access to transit. Given the continuing demand to live within the District, and the Mayor's recent goal to construct 36,000 new housing units within the District by 2025, land values in areas that are well-served by transit are likely to continue increasing at an exponential rate. This increase in land value is likely to increase the cost of housing in transit-rich areas higher than they already are. As a result, consistent with the goals and objectives of the Anacostia Transit Area Small Area Plan, it is important that the District maximize opportunities to increase residential density in areas that are close to metro. The recommended FLUM amendment presents one such opportunity, especially with regard to the properties highlighted in Figure 3. Similar to OP's recommendations to increase the FLUM designation for the areas around several Upper Northwest metro stations, OP should take full advantage of the current opportunity to increase housing potential near the Anacostia metro station. Doing so would provide the opportunity to generate additional housing in this area of the District, including affordable housing for residents that may be dependent highly on public transportation to carry out their day-to-day needs.

Another common amenity in the District's high-opportunity areas that is lacking in neighborhoods like Anacostia is quality retail and service uses. For too long, the commercial uses along Martin Luther King Jr. Avenue have struggled. Despite being a designated Great Street, and despite the FLUM being amended in 2010 to designate the corridor Mixed Use (Medium Density Commercial / Medium Density Residential), the Martin Luther King Jr. Avenue commercial corridor struggles to attract high-quality uses. This is partially due to the lack of critical daytime and nighttime population that is needed to sustain retail and service uses. The surrounding moderate density residential area to the east and moderate density commercial designation currently assigned to the properties in question do not bring enough foot traffic for the businesses along the corridor to thrive. The proposed FLUM amendment will help facilitate establishment of this critical mass by increasing the development potential of the properties in question and spurring a market-driven increase in commercial or residential density that will deliver better amenities that can be enjoyed by new and existing residents in the surrounding neighborhoods.